EXHIBIT F

Excerpts from Draft Permit Under the Resource Conservation and Recovery Act for General Electric Company, Pittsfield, MA, Issued by EPA (June 2014)

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Excerpts from Statement of Basis for EPA's Proposed Remedial Action for the Housatonic River "Rest of River," Issued by EPA (June 2014)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
EPA NEW ENGLAND

PERMIT UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) AS AMENDED (42 U.S.C. SECTION 6901 ET SEQ.)

General Electric Company
159 Plastics Avenue
Pittsfield, Massachusetts 01201
EPA I.D. No. MAD002084093

The Permittee is required to conduct certain activities at areas affected by releases of hazardous waste and/or hazardous constituents from the General Electric Facility located in Pittsfield, Massachusetts, in accordance with Sections 3004(u), 3004(v), and 3005(c) of the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), as specified in the conditions set forth herein.

This Permit has been prepared for RCRA Corrective Action activities to be performed by General Electric pursuant to a final Consent Decree, United States, et al. v. General Electric Company (D. Mass.) ("Consent Decree"). The Consent Decree memorializes an agreement to address releases of Waste Materials, including hazardous substances, hazardous waste, and/or hazardous constituents from the General Electric Company's Facility in Pittsfield, Massachusetts, including, but not limited to, the releases of hazardous waste and/or hazardous constituents addressed in this Permit. This Permit, upon the effective date, shall replace the HSWA Permit previously issued to the Permittee, initially issued on February 8, 1991, modified effective January 3, 1994, reissued in October 2000 and reissued again, effective December 5, 2007. Upon the effective date of this Reissued Permit, the previously issued 2007 Permit hereby is revoked, and, pursuant to the Consent Decree, the Remedial Action set forth in the Permit shall be implemented pursuant to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Consent Decree.

Dated: _____

Signed: _____DRAFT FOR PUBLIC COMMENT_____
James T. Owens III, Director
Office of Site Remediation and Restoration
U.S. Environmental Protection Agency, EPA New England
5 Post Office Square – Suite 100
Boston, Massachusetts 02109-3912

This Reissued Permit will become effective 30 days after signature of the EPA New England (Region 1) Director of the Office of Site Remediation and Restoration, unless review is requested on the permit under 40 Code of Federal Regulations (C.F.R.) 124.19, in which case, the effective date will be established in the context of such review(s).

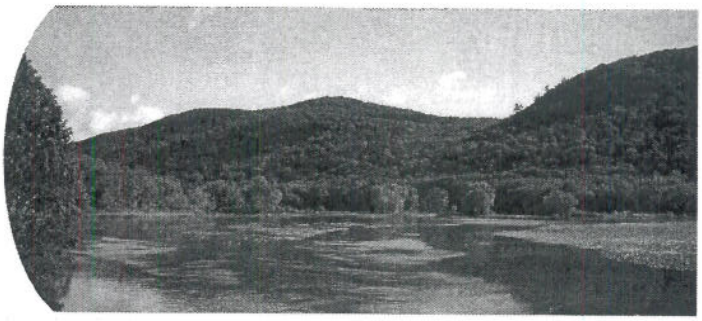
ATTACHMENT C
SUMMARY OF APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)

Statute/Regulation	Citation[a]	Synopsis of Requirements	Status	Action(s) to be Taken to Achieve ARARs
CHEMICAL-SPECIFIC ARARs				
Federal ARARs				
Clean Water Act, National Recommended Water Quality Criteria for PCBs	National Recommended Water Quality Criteria: 2002, EPA-822-R-02-047, USEPA, Office of Water, Office of Science and Technology (Nov. 2002)	Freshwater chronic aquatic life criterion (based on protection of mink): 0.014 ug/L. Human health criterion based on human consumption of water and organisms: 0.000064 ug/L.	Relevant and appropriate	The freshwater chronic aquatic life criterion of 0.014 ug/L will be met by the proposed alternative. Regarding the human health criterion based on human consumption of water and organisms of 0.000064 ug/L: In Massachusetts, the criterion is being waived on the grounds that achievement of this ARAR is technically impracticable, given that based on current data, it is not predicted to be met by this or any sediment alternative in Massachusetts. As a modified Performance Standard for this waived criterion, the remedy will be required to meet the Biota Performance Standard and Downstream Transport Performance Standards in the Permit. (For purposes of this Attachment C, "remedy" includes the corrective measures, remedial design and remedial action activities, and operation and maintenance activities undertaken pursuant to the Modification to the RCRA Permit.) In Connecticut, the remedy is intended to meet the standard. Current modeling shows the remedy will achieve attainment in at least 3 of the 4 Connecticut impoundments. However, the results from the Connecticut model are very uncertain due to the empirical, semi-quantitative nature of the analyses. As such, it is not possible to predict with certainty attainment or lack of attainment of the human health criterion based on human consumption of water and organisms of 0.000064 ug/L in Connecticut (Reaches 10-16). Thus, EPA does not believe that there is a basis to waive this criterion at this time.

LEARN MORE AT: www.epa.gov/region1/ge

Statement of Basis for EPA's Proposed Remedial Action for the Housatonic River "Rest of River"

THE RIVER *The Housatonic River is contaminated with polychlorinated biphenyls (PCBs) released from the General Electric Company (GE) facility in Pittsfield, MA. The entire site consists of the 254-acre GE facility; the Housatonic River and its banks and floodplains from Pittsfield, MA, to Long Island Sound; and other contaminated areas. Under a federal Consent Decree, GE is required to address contamination throughout the site, including in the River.*



YOUR OPINION COUNTS: OPPORTUNITIES TO COMMENT

EPA is accepting public comment on this proposal from June 25, 2014 through August 8, 2014. EPA's Proposed Remedial Action is based on current information and the cleanup plan could change in response to public comment or new information. The following two public informational meetings will include a presentation describing the Proposed Remedial Action, followed by a question and answer session. EPA will begin a formal public comment period on June 25, 2014. Near the end of the public comment period, EPA will schedule a Public Hearing where the public will have an opportunity to make oral comments during this Hearing for EPA to consider. You may also submit written comments – see page 43 to find out how.

For further information about these meetings, call Kelsey O'Neil of EPA's Community Affairs office at 617-918-1003, or toll-free at 1-888-372-7341.

Public Informational Meeting
Wednesday, June 18, 2014 at 6:00 pm at Lenox Memorial Middle/High School, Lenox, MA

Public Informational Meeting
Tuesday, June 24, 2014 at 6:00 pm at Kent Town Hall, Kent, CT

Public Hearing
date/time/location to be determined

SUMMARY:

After careful study of the impacts of PCBs released to the Housatonic River from the GE-Pittsfield/Housatonic River site in Pittsfield, MA, and in consideration of the contaminant reduction accomplished by cleanup activities at other parts of the site, EPA proposes the following cleanup actions, known as corrective measures, or remedial action, for the "Rest of River" component of the GE-Pittsfield/Housatonic River site. EPA's Proposed Remedial Action was developed after consultation with Massachusetts Departments of Environmental Protection (MassDEP) and Fish and Game (MassDFG) and the Connecticut Department of Energy and Environmental Protection (CT DEEP).This Statement of Basis, in conjunction with the Draft Modification to the Reissued RCRA Permit, constitute EPA's "Proposed Plan" or "Proposed Cleanup Plan," setting forth EPA's Proposed Remedial Action for the Rest of River and Operation and Maintenance (O&M) as prescribed by Paragraph 22.n. of the Consent Decree (termed the "Proposed Remedial Action" or "Proposed Cleanup Plan" throughout this document) to address polychlorinated biphenyl (PCB) contamination in river sediment, banks and floodplain soil, and biota which poses an unacceptable risk to human health and the environment.

In addition to addressing risks in the areas slated for cleanup, the Proposed Remedial Action also includes provisions to reduce downstream transport of PCBs, relax or remove fish consumption advisories, and to avoid, minimize and/or mitigate adverse impacts to state-listed species and their habitats regulated under the Massachusetts Endangered Species Act (MESA), and

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each Combination. Table 3 also shows trapping efficiency for solids in Woods Pond for each Combination.

As additional sources are controlled by permanently removing and/or capping PCB-contaminated sediment and reducing the contribution of PCBs from the contaminated eroding banks, significant additional reductions in PCB mass transport in the river and transport to the floodplain occurs. As a result, Combination Alternatives 1, 2 and 8 do the least to control releases. While Combination Alternatives 6 and 7 do the most to control releases, Combination Alternatives 3, 4, 5 and 9 also provide significant control of releases.

Combinations 7, 8, and 9 nearly double the solids trapping efficiency of Woods Pond when compared to the other Combinations. PCBs are attached to solids that move through the river system. Therefore, the increase in trapping of solids in Woods Pond is a mechanism to reduce downstream migration of PCBs. It is estimated that 25% of the mass of PCBs in the river sediment are within Woods Pond. Combinations 7 and 9, and to a lesser extent, Combination 8, also control sources of releases by removing a significant mass of PCBs from behind the Woods Pond dam. In the event of a serious breach or failure of the dam, the release of PCBs downstream would be less for these alternatives (7 through 9) than for Combinations 1 through 6 that rely primarily on capping or MNR.

The different combinations are expected to have different responses in the occurrence of an extreme flood event. Combinations 1 and 2 will have no different response than what would be expected to occur under current conditions as there is no active remediation. In this case, PCB-contaminated sediment and soil from eroding banks are expected to be released and mobilized downstream. Combination 8 is expected to result in similar, but slightly less downstream transport as it has only a small area in Reach 5A which is addressed with an engineering approach, and residual PCBs in Woods Pond are not capped. Combination 3 will result in slightly less transport than the previous alternatives, however the use of a thin-layer cap in Reach 5C and Woods Pond, and MNR in Reach 5B, the Backwaters and Reach 7 impoundments is not expected to adequately control sources of releases in an extreme event. Combinations 4 and 5 are expected to provide adequate protection in an extreme event in Reaches 5 and 6 but the use of thin-layer capping and backfill in the downstream reaches provides a high level of uncertainty in performance during such an event. Combination 6 followed by Combination 7 are expected to provide the highest level of protection of all the combinations during an extreme event as they provide the greatest amount of remediation with corresponding engineering controls. Combination 9 is expected to provide adequate protection in an extreme storm event in all reaches, with the exception of Reach 5B which is subject to MNR and therefore bed sediment and bank soil may erode and be transported downstream. However, the areas of the highest PCB concentrations in Reach 5B will be removed.

Compliance With Federal and State ARARs

A summary of some of the more significant chemical-, location-, and action-specific ARARs is included below.

Chemical-Specific ARARs

Chemical-specific ARARs include federal and state water quality criteria for PCBs. These criteria are the freshwater chronic aquatic life criterion of 0.014 micrograms per liter (ug/L) and the human health criterion (based on consumption of water and/or organisms) of 0.000064 ug/L (or 0.064 parts per trillion).

Combination Alternatives 1, 2, and 8 would not achieve the federal and state water quality criteria for freshwater aquatic life in Massachusetts (but would in Connecticut). Combination Alternatives 3-7 and 9 would achieve these criteria in all reaches of the river.

None of the alternatives would achieve the federal and state water quality criteria for human consumption of water and organisms in the any of the Massachusetts reaches. Combinations 1, 2, 3, and 8 would not achieve this criterion in any Connecticut impoundments. Based on modeling, Combination Alternatives 4, 6, 7, and 9 would restore water quality consistent with this criterion in 50% or more of the Connecticut impoundments. Because the water quality criteria for human consumption of organisms (0.000064 ug/L) is not expected to be met in the River in Massachusetts under any of the alternatives evaluated, EPA is proposing to waive this criterion under both Federal and State ARARs as technically impracticable in Reaches 5 through 9. As a modified Performance Standard for this waived criterion, the project will be required to meet the Biota Performance Standard and the Downstream Transport Performance Standard in the Permit.

Current modeling shows Combination Alternatives 7 and 9 will achieve the 0.000064 ug/L criterion in at least 3 of the 4 Connecticut impoundments. However, the results from the Connecticut model are very uncertain due to the empirical, semi-quantitative nature of the analyses. As such, it is not possible to predict with certainty attainment or nonattainment of the human health criterion based on human consumption

[2] The initial (i.e., current) annual PCB mass values used in the model are 20 kg/yr passing Woods Pond Dam, 19 kg/yr passing Rising Pond Dam, and 12 kg/yr transported from the river to the floodplain in Reaches 5 and 6.